

UNITED STATES DISTRICT COURT
for the
Eastern District of Michigan

United States of America

v.

Norma MUNOZ JIMENEZ,
aka JIMENEZ HERRERA, Delia
aka GUERRERO-MUNOZ, Alejandra
aka BUENDIA-MUNOZ, Perla Guadalupe
aka GONZALEZ, Esmeraldo

Case: 2:24-mj-30089

Assigned To : Unassigned

Assign. Date : 3/7/2024

Case No.

CMP: USA v MUNOZ-JIMENEZ (MAW)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of February 23, 2024 in the county of Wayne in the

Eastern District of Michigan, the defendant(s) violated:

*Code Section**Offense Description*

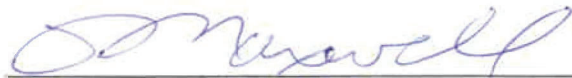
Title 8 U.S.C. Sec. 1326(a),(b)(1)

Illegal Reentry After Removal, Prior Felony Conviction

This criminal complaint is based on these facts:

On or about February 23, 2024, in the Eastern District of Michigan, Southern Division, Norma MUNOZ JIMENEZ, a citizen and national of Mexico, who was previously convicted of a felony, was found in the United States after having been denied admission, excluded, deported, and removed therefrom on or about June 15, 2012 and not having received the express consent of the Attorney General of the United States or the Secretary of the Department of Homeland Security, to re-apply for admission thereto; in violation of Title 8, United States Code, Section 1326(a), (b)(1).

☒ Continued on the attached sheet.


Complainant's signature

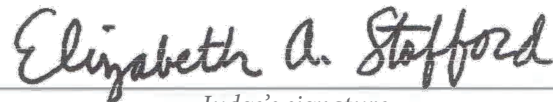
Joshua Maxwell, CBP Enforcement Officer

Printed name and title

Sworn to before me and signed in my presence
and/or by reliable electronic means.

Date: March 7, 2024

City and state: Detroit, Michigan


Judge's signature

Elizabeth A. Stafford, United States Magistrate Judge

Printed name and title

AFFIDAVIT

The affiant being duly deposed and sworn states:

1. I, Joshua R. Maxwell, am an Enforcement Officer with the Department of Homeland Security, Customs and Border Protection, and have been employed with the same for over twenty-three years. During my career as a law enforcement officer, I have been involved in various investigations and arrests concerning the reentry of illegal aliens and I have received training in this area. This affidavit is submitted in support of a finding of probable cause and is a summary of information known to law enforcement personnel, other civilian witnesses, and my personal knowledge.

2. On February 23, 2024, at approximately 3:00 pm, at the Detroit Ambassador Bridge, Detroit, Michigan, Customs and Border Protection Officers (CBPO), encountered a citizen and national of Mexico, Norma MUNOZ JIMENEZ, who got lost in Detroit and did not go to Canada, and who had been previously ordered removed and deported from the United States. MUNOZ JIMENEZ presented to CBP a Mexican driver's license in the name of Delia JIMMENEZ HERRERA. My investigation has revealed that MUNOZ JMENEZ also uses the alias names of Alejandra GUERRERO-MUNOZ; Perla Guadalupe BUENDIA-MUNOZ and Esmeraldo GONZALEZ.

3. On July 27, 1997, MUNOZ JIMENEZ was apprehended by CBP at Brownsville, Texas. MUNOZ JIMENEZ was served with an Expedited Removal for making a false claim to U.S. citizenship, by presenting a U.S.

birth certificate in the name of Nidia Lizeth Vega, in violation of Section 212(a)(6)(C)(ii) of the Immigration and Nationality Act (INA). MUNOZ JIMENEZ was physically removed from the United States to Mexico on July 28, 1997.

3. On December 8, 1997, MUNOZ JIMENEZ was convicted in Houston, Texas, for theft of property, greater than \$50, less than \$500. MUNOZ JIMENEZ pleaded guilty and was sentenced to 10 days' confinement and \$189 in court costs.

4. On September 14, 1999, MUNOZ JIMENEZ was convicted in the 19th District Court, Dearborn, Michigan, for Larceny in a Building. MUNOZ JIMENEZ was sentenced to 24 months' probation.

5. On February 14, 2000, MUNOZ JIMENEZ was apprehended by CBP at Douglas, Arizona. MUNOZ JIMENEZ was served with an Expedited Removal for being an imposter to an I-586, border crossing card, for presenting a card in the name of Olivia Martinez-Garcia, in violation of Section 212(a)(6)(C)(i) of the INA. MUNOZ JIMENEZ was physically removed from the United States to Mexico February 14, 2000.

6. On February 18, 2000, MUNOZ JIMENEZ was apprehended by CBP at Douglas, Arizona. MUNOZ JIMENEZ was served with an Expedited Removal for making an oral false claim to U.S. citizenship and presenting an Arizona driver's license in the name of Rebecca Dominguez, in violation of Section 212(a)(6)(C)(ii) of the INA.

7. On February 24, 2000, MUNOZ JIMENEZ was convicted in the United States District Court of Arizona, for Fraudulent Identification Documents, in violation of Title 18 U.S.C. §1028, under an alias name of Alejandra Guerrero-Munoz. MUNOZ JIMENEZ was sentenced to time served (6 days) and a \$25 special assessment. MUNOZ JIMENEZ was physically removed from the United States to Mexico on February 24, 2000.

8. On July 31, 2001, MUNOZ JIMENEZ was convicted in the 18th District Court, Westland, Michigan, for Retail Fraud – Third Degree. MUNOZ JIMENEZ was sentenced to 4 days' confinement and 12 months' probation.

9. On March 13, 2002, MUNOZ JIMENEZ was convicted in the 15th District Court, Ann Arbor, Michigan, for Retail Fraud – Third Degree. MUNOZ JIMENEZ was sentenced to 3 days' confinement and a \$250 fine.

10. On August 12, 2002, MUNOZ JIMENEZ was convicted in the 19th District Court, Dearborn, Michigan, for Larceny in a Building. MUNOZ JIMENEZ was sentenced to 60 days' confinement.

11. On October 17, 2002, MUNOZ JIMENEZ was encountered by the United States Border Patrol (USBP) while incarcerated at the Calhoun County Jail, Michigan. MUNOZ JIMENEZ's previous order of removal was reinstated via Form I-871, as she was in violation of Section 212(a)(6)(A)(i) of the INA. MUNOZ JIMENEZ was physically removed from the United States to Mexico.

12. On May 1, 2003, MUNOZ JIMENEZ was encountered by Immigration and Customs Enforcement (ICE) while incarcerated at the Isabella County

Jail, Michigan. MUNOZ JIMENEZ's previous order of removal was reinstated via Form I-871, as she was in violation of Section 212(a)(9)(A)(ii) of the INA.

13. On November 6, 2003, MUNOZ JIMENEZ was convicted in the United States District Court of Michigan, for Unlawful Re-Entry, in violation of Title 8 U.S.C. §1326. MUNOZ JIMENEZ pleaded guilty and was sentenced to 12 months' confinement and 12 months of supervised release. MUNOZ JIMENEZ was physically removed from the United States to Mexico on June 1, 2004.

14. On April 7, 2006, MUNOZ JIMENEZ was encountered by USBP at/near Laredo, Texas, for entering the United States without inspection in violation of 212(a)(6)(A)(i) of the INA. MUNOZ JIMENEZ's previous order of removal was reinstated via Form I-871, as she was in violation of Section 212(a)(9)(A)(i) of the INA. MUNOZ JIMENEZ was physically removed from the United States to Mexico on April 11, 2006.

15. On November 14, 2006, MUNOZ JIMENEZ was encountered by USBP at/near Laredo, Texas, for entering the United States without inspection in violation of 212(a)(6)(A)(i) of the INA. MUNOZ JIMENEZ's previous order of removal was reinstated via Form I-871, as she was in violation of Section 212(a)(9)(A)(i) of the INA. MUNOZ JIMENEZ was physically removed from the United States to Mexico on November 14, 2006.

16. On July 18, 2009, MUNOZ JIMENEZ was arrested by the Laredo Police Department, Texas, for Theft of Property, Greater than \$50, Less than

\$500, using the name of Perla Guadalupe Buendia-Munoz. The disposition is listed as “absconder”.

17. On May 14, 2010, MUNOZ JIMENEZ was arrested by the Ann Arbor Police Department, Michigan, for fraudulent activities, using the name Simona Marie Mendoza. MUNOZ JIMENEZ failed to appear in court and a warrant was issued. That warrant is still outstanding.

18. On March 5, 2011, MUNOZ JIMENEZ was arrested by the Houston Police Department, Texas, for Theft Class C, using the name of Esmeraldo Gonzalez.

19. On March 7, 2011, MUNOZ JIMENEZ was encountered by ICE while incarcerated with the Houston Police Department, Texas. MUNOZ JIMENEZ’s previous order of removal was reinstated via Form I-871, as she was in violation of Section 212(a)(9)(C)(ii) of the INA.

20. On June 6, 2011, MUNOZ JIMENEZ was convicted in the United States District Court, Southern District of Texas, for Unlawful Re-Entry, in violation of Title 8 U.S.C. §1326(a) and (b)(1). MUNOZ JIMENEZ pleaded guilty and was sentenced to 15 months’ confinement and 24 months of supervised release. MUNOZ JIMENEZ was physically removed from the United States to Mexico on June 15, 2012.

21. On Monday, March 4, 2024, at Detroit, Michigan, MUNOZ JIMENEZ was apprehended by immigration authorities and detained.

22. The aforementioned apprehension and subsequent detention was an administrative, non-criminal action made pursuant to the authority found in sections 1357, 1225, 1226, and/or 1231 of Title 8, United States Code to arrest and detain any non-citizen entering or attempting to enter the United States, or any non-citizen present in the United States, who is reasonably believed to be in violation of any law or regulation regulating the admission, exclusion, expulsion, or removal of noncitizens.

23. MUNOZ JIMENEZ's fingerprints and photograph were captured and entered into the IDENT and IAFIS systems. The results revealed that MUNOZ JIMENEZ, is a citizen of Mexico who has been previously removed from the United States. The record checks reveal that no record exists of MUNOZ JIMENEZ obtaining permission from the Attorney General or the Secretary of the Department of Homeland Security to re-apply for admission to the United States following his removal from the United States on or about June 15, 2012.

24. Therefore, based upon the aforementioned facts, I have probable cause to believe that on or about February 23, 2024, in the Eastern District of Michigan, Norma MUNOZ JIMENEZ, a non-citizen, who was previously convicted of a felony offense, was found in the United States after having been denied admission, excluded, deported, and removed therefrom on or about June 15, 2012, and not having obtained the express consent of the Attorney General of the United States or the Secretary of the Department of

Homeland Security, in violation of Title 8 United States Code, Section 1326(a), (b)(1).

A handwritten signature in blue ink that reads "Maxwell".

Joshua R. Maxwell, Enforcement Officer
U.S. Customs and Border Protection

Subscribed and Sworn to before me and signed in my presence and/or by reliable electronic means.

A handwritten signature in black ink that reads "Elizabeth A. Stafford".

Elizabeth A. Stafford
United States Magistrate Judge

Date: March 7, 2024